

ASSOCIATION OF

FEDERAL COMMUNICATIONS CONSULTING ENGINEERS

WASHINGTON, D. C.

March 9, 1995

DOCKET FILE COPY ORIGINAL

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, NW Room 222  
Washington, DC 20554

RECEIVED  
MAR 9 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Re: ET Docket No. 95-18

Dear Mr. Caton:

Enclosed are 10 copies (original and nine) of the comments prepared by this Association "In the Matter of Amendment of Section 2.106 of the Commission's Rules to Allocate Spectrum at 2 GHz for Use by the Mobile Satellite Service".

If there are any questions or comments concerning this filing, please contact the undersigned.

Sincerely,

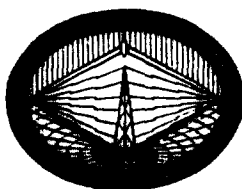
Donald G. Everist  
1300 L Street, NW Suite 1100  
Washington, DC 20005  
(202) 898-0111

DGE:cc

Encl.

cc: John F.X. Browne  
John Lundin

No. of Copies rec'd 029  
List ABCDE



ASSOCIATION OF

# FEDERAL COMMUNICATIONS CONSULTING ENGINEERS

WASHINGTON, D. C.

Before the  
*FEDERAL COMMUNICATIONS COMMISSION*  
Washington, D.C. 20554

**RECEIVED**

**MAR 9 1995**

*FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY*

In the Matter of

Amendment of Section 2.106 of the  
Commission's Rules to Allocate  
Spectrum at 2 GHz for Use by the  
Mobile Satellite Service

) ET Docket No. 95-18  
) RM-7927  
)  
)

**DOCKET FILE COPY ORIGINAL**

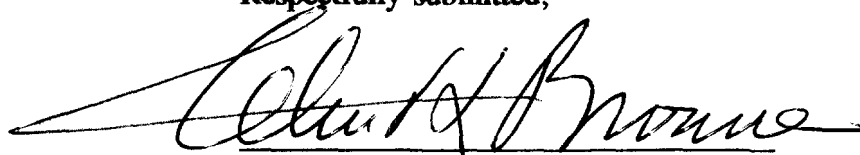
## COMMENTS OF THE ASSOCIATION OF FEDERAL COMMUNICATIONS CONSULTING ENGINEERS

The Association of Federal Communications Consulting Engineers (AFCCE) is an organization that includes members who are registered professional engineers engaged in the practice of consulting engineering or are communications company engineering executives. The AFCCE was organized in 1948 and has, for more than 46 years, been pleased and honored to share its professional experience and insight with the Federal Communications Commission (FCC).

In the Notice of Proposed Rule Making (NPRM) in ET Docket 95-18, the FCC proposes to allocate 70 MHz of spectrum in the 2 GHz band to the mobile satellite service (MSS). Specifically, it proposes to allocate 1990-2025 MHz for the "earth-to-space" link, and 2165-2200 MHz for the "space-to-earth" link.

In summary, if the FCC decides to reallocate spectrum from BAS and fixed microwave services to MSS, the AFCCE believes it should provide the same amount of spectrum presently available to the relocated services. Furthermore, the MSS provider should bear all costs of relocating the existing BAS and fixed microwave service operations to comparable or better facilities.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "John F.X. Browne", written over a horizontal line.

John F.X. Browne  
President

Association of Federal Communications  
Consulting Engineers

March 03, 1995

The 1990-2025 MHz band is currently part of the 1990-2110 MHz band allocated for broadcast auxiliary services (BAS). As noted in the FCC's NPRM, this band is heavily used for electronic news gathering (ENG). The AFCCE concurs with the FCC in the belief that BAS/MSS shared use of the 1990-2025 MHz band is not feasible. To accommodate existing BAS users, the FCC proposes to add 35 MHz of spectrum to the upper end of the BAS band from 2110-2145 MHz. The revised BAS band will then be from 2025-2145 MHz, resulting in the same amount of available spectrum. The 2110-2130 MHz portion of the band is currently used by common carrier fixed microwave services and the 2130-2145 MHz portion is currently used by private fixed microwave services. Because of the mobile nature of ENG operations, the AFCCE concurs with the FCC that shared BAS and fixed microwave use of the 2110-2145 MHz band is also not feasible.

The FCC proposes to require MSS providers to bear the costs associated with relocating existing BAS operations from the 1990-2025 MHz band; AFCCE concurs. In addition, MSS providers must bear the cost of relocating affected fixed microwave users in the 2110-2145 MHz band to accommodate relocated BAS operations. The MSS provider must guarantee payment of all relocation expenses, build the new facilities for the relocated frequencies, and demonstrate that the new facilities are comparable to the former. To minimize disruption and impact to existing BAS and fixed microwave users, the AFCCE supports application of the FCC's involuntary relocation policy as described in the NPRM. Furthermore, because of the existing heavy demand for BAS (ENG) spectrum, especially in the major markets, the AFCCE supports retention of the same amount of available BAS spectrum (120 MHz) in the 2 GHz band.

The 2165-2200 MHz band is currently used by common carrier and private fixed microwave services. The FCC proposes to require MSS providers to bear the cost of relocating these incumbent fixed microwave users. The AFCCE supports application of the FCC's involuntary relocation policy in this case also.